

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

IN RE: Harold J Nicholson and  
Christine Y Blades

DEBTORS

Case No. 19 B 00087  
Chapter 13

Judge Jack B Schmetterer

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**NOTICE OF MOTION**

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TO: US Trustee (by ECF)  
Tom Vaughn, Chapter 13 Trustee (by ECF)  
See attached Service List

PLEASE TAKE NOTICE that on November 4, 2020, at 10:00 a.m., I will appear before the Honorable Jack B Schmetterer, or any judge sitting in that judge's place, and present Debtor's Motion to Modify Plan, a copy of which is attached.

**This motion will be presented and heard electronically using AT&T Teleconference.**

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must call this toll-free number: 1-877-336-1839. Then enter access code 3900709 followed by the pound (#) sign.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Respectfully submitted,

By: /s/ Angie Lee  
Debtors' attorney

Angie S Lee (Ill. #6282075)  
Lee Ratliff & Associates LLC  
PO Box 677  
Flossmoor IL 60422  
708-365-9937  
angieleelaw900@gmail.com

Case 19-00087 Doc 43 Filed 10/21/20 Entered 10/21/20 05:25:51 Desc Main  
Label Matrix for local noticing Document Page 2 of 6 Consumer Portfolio Services  
0752-1 294 Union St. P.O. Box 57071  
Case 19-00087 Hackensack, NJ 07601-4303 Irvine, CA 92619-7071

Northern District of Illinois  
Eastern Division  
Wed Oct 21 05:17:29 CDT 2020

Exeter Finance LLC, c/o AIS Portfolio Servic  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

(p) JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

(p) AMERICAN HONDA FINANCE  
P O BOX 168088  
IRVING TX 75016-8088

Atlas Acquisitions LLC (Services Credit Uni  
294 Union St.  
Hackensack, NJ 07601-4303

Blitt & Gaines PC  
661 Glenn Ave  
Wheeling, IL 60090-6017

Bradley Sullivan  
221 N LASALLE#1906  
Chicago, IL 60601-1419

Brandon S. Lefkowitz  
29777 Telegraph Road, Suite 2440  
Southfield, MI 48034-7667

Capital One Bank (USA), N.A.  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Capital One Bank Usa N  
Po Box 30281  
Salt Lake City, UT 84130-0281

Chase Auto  
Po Box 901003  
Ft Worth, TX 76101-2003

Collection Bureau Of A  
25954 Eden Landing Road  
Hayward, CA 94545-3837

Comenity Bank/carsons  
Po Box 182789  
Columbus, OH 43218-2789

Consumer Portfolio Svc  
19500 Jamboree Rd  
Irvine, CA 92612-2411

Countryplace Mortgage  
15301 Spectrum Drive  
Addison, TX 75001-4665

Credit Management Lp  
Po Box 118288  
Carrollton, TX 75011-8288

Credit One Bank Na  
Po Box 98872  
Las Vegas, NV 89193-8872

Exeter Finance LLC  
AIS Portfolio Services, LP  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Exeter Finance Llc  
Po Box 166097  
Irving, TX 75016-6097

First Premier Bank  
3820 N Louise Ave  
Sioux Falls, SD 57107-0145

Genesis/celtic Indigo  
Po Box 4499  
Beaverton, OR 97076-4499

IRS  
PO Box 7346  
Philadelphia, PA 19101-7346

LVNV Funding, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

MERRICK BANK  
Resurgent Capital Services  
PO Box 10368  
Greenville, SC 29603-0368

Merchants Credit Guide  
223 W Jackson Blvd Ste 7  
Chicago, IL 60606-6914

Merrick Bank Corp  
10705 S Jordan Gateway  
South Jordan, UT 84095-3977

Midland Funding  
2365 Northside Dr Ste 30  
San Diego, CA 92108-2709

Midland Funding, LLC  
Midland Credit Management, Inc. as  
agent for Midland Funding, LLC  
PO Box 2011  
Warren, MI 48090-2011

Oppity Fin  
11 E. Adams  
Chicago, IL 60603-6301

Opportunity Financial, LLC  
130 E. Randolph Street  
Suite 3400  
Chicago, IL 60601-6379

PRA  
PO Box 41067  
Norfolk, VA 23541-1067

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Premier Bankcard, Llc  
Jefferson Capital Systems LLC Assignee  
Po Box 7999  
Saint Cloud Mn 56302-7999

Quantum3 Group LLC as agent for  
Comenity Bank  
PO Box 788  
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for  
GPCC I LLC  
PO Box 788  
Kirkland, WA 98083-0788

(p)ABSOLUTE RESOLUTIONS CORPORATION  
8000 NORMAN CENTER DRIVE SUITE 350  
BLOOMINGTON MN 55437-1118

Rep/build  
Po Box 9203  
Old Bethpage, NY 11804-9003

Safeco Insurance ASO VOLPE, DWIGHT  
Wilber & Associates  
210 Landmark Dr  
Normal, IL 61761-2119

State Farm  
MATHEIN & ROSTOKER  
662 W GRAND 4TH FL  
Chicago, IL 60654-5565

Synccb/tjx Cos  
Po Box 965015  
Orlando, FL 32896-5015

Synccb/walmart  
Po Box 965024  
Orlando, FL 32896-5024

Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk VA 23541-1021

Tbom/contfin  
Pob 8099  
Newark, DE 19714-8099

Angie S Lee  
Lee Ratliff & Associates LLC  
PO Box 677  
Flossmoor, IL 60422-0677

Christine Y Blades  
75 Chillon Drive  
Lynwood, IL 60411-6731

Harold J Nicholson Jr.  
75 Chillon Drive  
Lynwood, IL 60411-6731

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Tom Vaughn  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Jefferson Capital Systems, LLC  
PO BOX 7999  
Saint Cloud, MN 56301-9617

American Honda Finance  
2170 Point Blvd  
Elgin, IL 60123

(d)American Honda Finance Corporation  
National Bankruptcy Center  
P.O. Box 168088  
Irving, TX 75016-8088

16 Mcleland Rd

Saint Cloud, MN 56303

(d) Jefferson Capital Systems LLC

PO Box 7999

St Cloud MN 56302-9617

Po Box 7999

Saint Cloud Mn 56302-9617

Portfolio Recovery Associates, LLC  
C/Ocapital One Bank (usa), N.a.  
POB 41067  
Norfolk VA 23541

(d)Portfolio Recovery Associates, LLC  
c/o Tjx Rewards Credit Card  
POB 41067  
Norfolk VA 23541

Razor Capital, LLC  
c/o Absolute Resolutions Corporation  
8000 Norman Center Drive, Suite 350  
Bloomington, MN 55437

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Atlas Acquisitions LLC  
294 Union St.  
Hackensack, NJ 07601-4303

(d)Consumer Portfolio Services  
P. O. Box 57071  
Irvine, CA 92619-7071

(u)Indigo

(d)Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

End of Label Matrix		
Mailable recipients	51	
Bypassed recipients	4	
Total	55	

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

IN RE:  Harold J Nicholson and Christine Y Blades	Case No. 19 B 00087 Chapter 13
DEBTORS	Judge Jack B Schmetterer

**MOTION TO MODIFY PLAN and TO SHORTEN NOTICE**

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Now come Harold Nicholson and Christine Blades (hereinafter "DEBTORS"), by and through their attorney, Lee Ratliff & Associates LLC, and move this Honorable Court for entry of an Order to Modify their Plan and to shorten notice, and in support thereof, respectfully represents as follows:

1. On January 2, 2019, Debtors filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. Debtors' Plan was confirmed at \$285.00 per month.
3. Debtors believed they were current and they have paid \$5212.00.
4. Debtors request that the current default be deferred and that payments increase to \$313.00 for the remaining months.
5. Debtors also request shortened notice due to Trustee's pending motion to dismiss.
6. Debtors wish to proceed with this case to keep their two vehicles.
7. Debtors also filed their 2019 taxes timely, but their attorney failed to submit them to the Trustee portal.

Wherefore, Debtors respectfully pray that this Court will enter an order modifying their Plan and for such other and further relief as this Court deems fair and just.

Respectfully submitted,

/s/ Angie S. Lee  
Angie S. Lee #6282075  
Lee Ratliff & Associates LLC

PO Box 677  
Flossmoor IL 60422  
708-365-9937  
angieleelaw900@gmail.com

Attorney for the Debtors